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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE:	Honorable Rosemary Gambardella
Alejandro Vincente Perez and Cathy Hanenberg Perez, Debtors.	Chapter 13 Bankruptcy No. 10-24182 RG
Alejandro Vincente Perez and Cathy Hanenberg Perez, Plaintiffs, v. JPMorgan Chase Bank, N.A., Chase Home Finance LLC; and Phelan Hallinan & Schmieg, PC,	Adv. Proc. No. 11-ap-2711 RG
	Hearing Date: July 31, 2013
Defendants.	

**CERTIFICATION OF KENNETH S. GOODKIND IN SUPPORT OF MOTION
OF DEFENDANT PHELAN HALLINAN & DIAMOND, PC FOR SANCTIONS
AND RELATED RELIEF PURSUANT TO FRCP 11, FRBP 9011,
28 U.S.C. § 1927 AND/OR THE COURT'S INHERENT POWERS,
BASED UPON THE SECOND AMENDED COMPLAINT**

I, KENNETH S. GOODKIND, ESQ., of full age, do hereby certify that:

1. I am counsel to Phelan Hallinan & Diamond, PC, f/k/a Phelan Hallinan & Schmieg, PC (“PHD”), a Defendant in the above-captioned Adversary Proceeding. I make this Certification in Support of PHD’s Motion for Sanctions and Related Relief Pursuant to FRCP 11, FRBP 9011, 28 U.S.C. § 1927 and/or the Court’s Inherent Powers, Based Upon the Second Amended Complaint (the “Motion”).

2. The Motion seeks sanctions against Andy Winchell, Esquire, counsel for debtors Alejandro Vincente Perez and Cathy Hanenberg Perez (“Debtors”) for filing and prosecuting a frivolous lawsuit against PHD. PHD requests sanctions, including an award of its counsel fees, incurred in connection with this litigation, and any such other and further relief as the Court deems just and proper.

3. I certify that the factual statements contained within the Brief in support of the Motion are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

FLASTER/GREENBERG P.C.

Dated: June 28, 2013

By: /s/ Kenneth S. Goodkind
KENNETH S. GOODKIND, ESQUIRE